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December 8, 2005

**Via Electronic Submission**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-A325  
Washington, DC 20554

**Re: *Ex Parte* Presentation,**

**E911 Requirements for IP-Enabled Service Providers- WC Docket No. 05-196**  
**Consumer Protection in the Broadband Era- WC Docket No. 05-271**

Dear Ms. Dortch:

On behalf of the Alarm Industry Communications Committee (AICC), Lou Fiore, Bob Bonifas, Bill Signer and I met with Scott Bergmann, Legal Advisor to Commissioner Adelstein, on December 7, 2005, to discuss the alarm industry's concerns with voice over internet protocol (VoIP) services and the comments filed by the Central Station Alarm Association and AICC in the FCC's ongoing proceeding concerning the provision of E911 capability by VoIP providers. In the E911 VoIP proceeding, the alarm industry asked the FCC to impose notification and non-interference requirements on VoIP providers to protect the safety interests of subscribers to central station alarm services. Information concerning notification that was provided at the meeting is attached hereto.

In the meeting, AICC stated that to be compatible with alarm service, VoIP providers must:

1. Pass alarm communicator signals undistorted.
2. Ensure line seizure is not compromised.
3. Provide the ability for alarm control panels to "see" a telephone line equivalent (voltage and dialtone).
4. Provide sufficient battery backup for VoIP and cable hardware.

AICC explained that the alarm industry must meet certain battery backup requirements in connection with fire alarm services and that VoIP services currently are not compatible with these requirements.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being electronically filed with your office. Please associate this letter with the files in the above-referenced proceedings.

Sincerely,

\_\_\_\_\_/s/\_\_\_\_\_  
Mary J. Sisak

cc: Scott Bergmann

A VoIP service provider shall provide clear and conspicuous notice to each customer prior to installation and/or number activation of VoIP service that to ensure proper functioning of alarm and security system monitoring services:

1. the customer's alarm or security system must be tested and the alarm or security provider must be notified after VoIP service is installed; and
2. in order for alarm and security system signaling to function in the event of a power outage, twenty-four hour battery backup is required for equipment installed in connection with the VoIP service.

Equipment sold or provided which is necessary to connect VoIP service shall contain a clear and conspicuous warning that to ensure proper functioning of alarm and security system monitoring services:

1. the customer's alarm or security system must be tested and the alarm or security provider must be notified when VoIP service is installed; and
2. in order for alarm and security system signaling to function in the event of a power outage, twenty-four hour battery backup is required for equipment installed in connection with the VoIP service.